

Shelley D. Krohn, Trustee
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Chapter 7 Bankruptcy Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In Re:

JESUS J. REYES and
PIEDAD E. REYES

Debtor(s).

Chapter 7
Case No. BKS-14-17610-MKN

**MOTION FOR AN ORDER SHORTENING
TIME ON TRUSTEE'S MOTION TO SELL
NON- EXEMPT ASSETS FREE AND CLEAR
OF LIENS AND ENCUMBRANCES**

Hearing Date: OST Requested
Hearing Time: OST Requested

COME NOW Shelley D. Krohn, Chapter 7 Trustee ("Trustee"), and hereby file the instant Motion for Order Shortening Time on Trustee's Motion to Sell Non-exempt Real Estate Free and Clear of Liens and Encumbrances.

As grounds for the Motion Shortening Time, the Trustee represents that the Debtors are surrendering their interest in non-exempt real estate in Nevada. The Trustee has obtained a buyer for said real estate, obtained the secured creditor's agreement to the short sale and the escrow is set to close on or before March 27, 2017. The short sale will result in \$5,000.00 for general unsecured creditors that would not otherwise be available. This matter should be heard as soon as possible so as to allow the Trustee to sell the real estate for the benefit of the unsecured creditors of the Estate.

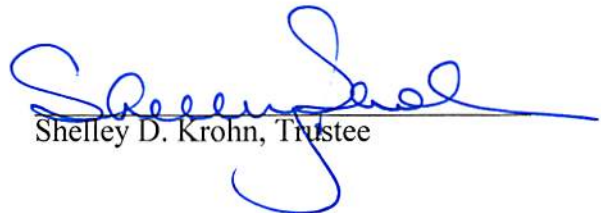
Dated this 14 day of March, 2017.


SHELLEY D. KRONN, Trustee

DECLARATION OF SHELLEY D. KROHN, TRUSTEE

I, Shelley D. Krohn, first being duly sworn upon my oath, depose and state as follows:

1. I am the duly appointed Chapter 7 Trustee of the above-captioned Estate.
2. I previously listed the Debtor's non-exempt real estate in Nevada for sale.
3. I have negotiated a sales price for the real estate that will result in funds for the unsecured class of creditors.
4. The parties to the escrow agreement desire to close on or before March 27, 2017.
5. I would respectfully request that this matter be heard on or before March 23, 2017, so as to allow time for escrow to close.
6. This matter should be heard in an expedited manner in efforts to preserve the sale and the distribution to the unsecured class of creditors.
7. Until this matter is heard, the sale is at risk of being cancelled.
8. Further Declarant Sayeth Naught.


Shelley D. Krohn, Trustee